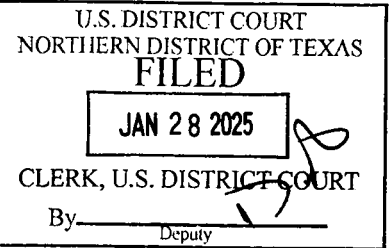


UNITED STATES DISTRICT COURT

for the
Northern District of Texas



United States of America

v.

Pedro Martinez-Martinez

Defendant(s)

Case No. 2:25-MJ-12

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 27, 2025 in the county of Sherman in the

Northern District of Texas, the defendant(s) violated:

Code Section
8 U.S.C. Section 1326(a)

Offense Description
Illegal Re-entry After Deportation

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


Complainant's signature

Eric Johnson, HSI SA
Printed name and title

Attested to by the applicant in accordance with the requirements of FED. R. CRIM. P. 4.1 by telephone this 28th day of January 2025.

Date: 1/28/25


Judge's signature

City and state: Amarillo, TX

Lee Ann Reno, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT
Case No. 2:25-MJ-12

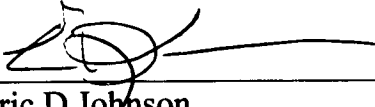
Title 8, United States Code, Section 1326(a)

As a result of my training and experience, I am familiar with federal immigration laws, including 8 U.S.C. § 1326(a), which makes it unlawful to illegally re-enter the United States after deportation or removal. There are four elements to this offense: (1) That the defendant was an alien at the time alleged in the indictment; (2) That the defendant had previously been deported, denied admission, excluded, or removed from the United States; (3) That thereafter the defendant knowingly entered, attempted to enter, or was found in the United States; and (4) That the defendant had not received the consent of the Secretary of the Department of Homeland Security or the Attorney General of the United States to apply for readmission to the United States since the time of the defendant's previous deportation. An "alien" is any person who is not a citizen or national of the United States. 8 U.S.C. 1101(a)(3).

Facts Establishing Probable Cause

On January 27, 2025, Deportation Officers with Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), encountered Pedro MARTINEZ-Martinez pursuant to a traffic stop, by the Stratford Police Department, on Highway 54, in Stratford, TX, which is in the Amarillo Division of the Northern District of Texas. Immigration records were queried and discovered that MARTINEZ-Martinez is, and was on January 27, 2025, a citizen and national of Mexico by virtue of his birth in Vera Cruz, Mexico. Those records also showed that MARTINEZ-Martinez had been

removed from the United States on December 27, 2023, at the Port of Departure at San Luis, Arizona. MARTINEZ-Martinez immigration records showed that he had not received the consent of the Secretary of the Department of Homeland Security or the Attorney General of the United States to apply for readmission to the United States since the time of that previous removal.


Eric D Johnson
Homeland Security Investigations
Special Agent

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the affiant under oath, and the affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the affiant, that the document received by me is a correct and complete copy of the document submitted by the affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the affiant's knowledge.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 28th day of January, 2025.


LEE ANN RENO
UNITED STATES MAGISTRATE JUDGE